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February 8, 2008

BY ECF

Honorable Andrew J. Peck
United States Magistrate Judge
U.S. Courthouse
500 Pearl Street, Room 1370
New York, New York 10007

Re: Akinyemi v. Chertoff, 07 CV 4048 (AJP)

Dear Judge Peck:

I am the attorney for the plaintiff in the above-referenced action. I write this letter to respectfully seek an extension of time for plaintiff to serve and file her opposition papers to the defendant's pending motion for summary judgment. Plaintiff's papers are due today, Friday, February 8, 2008.

I discussed the extension with counsel for the Government, Assistant United States Attorney John D. Clopper. While Mr. Clopper indicated that he will not oppose the grant of a two weeks extension to the plaintiff, I reckon that I will need more than two weeks for reasons which I shall state. When the Government served me with its motion papers on January 25, 2008, I already had briefs which I was working on. One of those briefs was in Stack v. Midwood, Dkt. #2007-5123 (Appellate Division, Second Department), which was filed on January 31, 2008. The other was in King v. Brando, 07-3678-cv (Second Circuit), which was filed on February 4, 2008.

I was working simultaneously on these briefs while still attending to motions, court conferences, client interviews, correspondence and my other daily chores as a solo practitioner. I have already started working on plaintiff's opposition to the summary judgment motion, but I am far from done. Currently, I am working on a Reply Brief which is due for filing in the Second Circuit of Appeals by Wednesday, February 15, 2008. This is in the case of Kelsey v. City of New York, 07-0290-cv.

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In light of the foregoing, I respectfully request a 30-day extension from today, to serve and file plaintiff's opposition papers to the motion for summary judgment. This is plaintiff's first application for extension of time within which to respond to the summary judgment motion.

Respectfully submitted,

/s/ K.C. Okoli
K.C. Okoli
(KO-7222)

cc: John D. Clopper, AUSA (By Fax)